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Cc:

Subject: RE: Redefine RCP questions

IRC 7122(d)(1) directs the Service to prescribe guidelines for evaluating offers-in-compromise.

IRC 7122(d)(3) states that such guidelines shall provide "(A) an officer or employee of the Internal Revenue Service shall not reject an offer-in-compromise from a low-income taxpayer solely on the basis of the amount of the offer."

Treas.Reg. section 301.7122-1(f)(3) states: "No offer to compromise may be rejected solely on the basis of the amount of the offer without evaluating the offer under the provisions of this section and the Secretary's policies and procedures regarding the compromise of cases." The regulation applies to all offers, not just those submitted by low-income taxpayers.